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March 30, 2022

**Via ECF**

The Honorable Michael A. Hammer,  
United States Magistrate Judge  
Martin Luther King, Jr. Federal Building  
And Courthouse, 2<sup>nd</sup> Floor  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Bianchi v. Samsung Electronics America, Inc. et al.***  
**Civil Action No.: 2:17-cv-01263-CCC-MAM**

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant Samsung Electronics America, Inc. ("SEA") in the above-referenced matter. As per Your Honor's direction in the Order of February 16, 2022, we are providing a joint status report.

An extended mediation with the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.) resulted in a Settlement Agreement between the parties. The parties continue to work jointly to effectuate the settlement and enlist Judge Cavanaugh's assistance as needed. We respectfully propose updating the Court again in June 2022.

Respectfully,

*/s/ James J. O'Hara*

Respectfully,

*/s/ Kevin Laukaitis*

JAMES J. O'HARA  
On behalf of Defendant,  
Samsung Electronics America, Inc.

KEVIN LAUKAITIS  
On behalf of Plaintiffs

cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)